UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

| AL'S PALS PET CARE, at al., | § | |
|---|--------|------------------|
| Plaintiffs, | § § | |
| | § | CIVIL ACTION NO. |
| VS. | § | |
| | 8 | 4:17-CV-3852 |
| WOODFOREST NATIONAL BANK, N.A., et al., | § | |
| | § | |
| Defendants. | § | |

JOINT NOTICE OF SETTLEMENT

COME NOW Plaintiffs and Defendants and hereby notify the Court that they have reached an agreement in principle to settle this matter on a class-wide basis. The parties are in the process of drafting a written settlement agreement and anticipate finalizing that agreement over the next few weeks. Plaintiffs anticipate filing an unopposed motion for preliminary approval of the settlement no later than August 31, 2018.

/s/ E. Adam Webb

E. Adam Webb
WEBB, KLASE & LEMOND, LLC
Georgia Bar No. 743910
Adam@WebbLLC.com
1900 The Exchange, S.E.
Suite 480
Atlanta, GA 30339
Telephone: (770) 444-0773

Andrew K. Meade
Texas Bar No. 24032854
ameade@meadeneese.com
D. John Neese, Jr.
Texas Bar No. 24002678
jneese@meadeneese.com
Leann Pinkerton
Texas Bar No. 24038826
lpinkerton@meadeneese.com
MEADE & NEESE LLP
2118 Smith Street
Houston, TX 77002
Telephone: (713) 355-1200

Attorneys for Plaintiffs

/s/ Behnam Dayanim

Behnam Dayanim bdayanim@paulhastings.com C. Reade Jacob, Jr. readejacob@paulhastings.com PAUL HASTINGS LLP 875 15th Street, N.W. Washington, DC 20005 Telephone: (202) 551-1737

William K. Whitner kwhitner@paulhastings.com PAUL HASTINGS LLP 1170 Peachtree Street, N.E. Suite 100 Atlanta, GA 30309 Telephone: (404) 815-2228

Attorneys for Woodforest National Bank and Paysafe Payment Processing Solutions